

**UNITED STATES BANKRUPTCY COURT
FOR THE EASTERN DISTRICT OF PENNSYLVANIA**

IN RE) CHAPTER 7
)
RON FISH ELECTRICAL SERVICES, LLC,) CASE NO.: 24-13275-AMC
Debtor)
~~~~~ )  
FORD MOTOR CREDIT COMPANY LLC, )  
Movant )  
vs. )  
RON FISH ELECTRICAL SERVICES, LLC, )  
Respondent(s) )  
and )  
 )  
ROBERT W. SEITZER )  
Trustee )  
 )  
 )

**MOTION FOR RELIEF FROM AUTOMATIC STAY**

AND NOW, comes the above-captioned Movant, Ford Motor Credit Company LLC, by and through their attorney, Regina Cohen, who files this Motion based upon the following:

1. The Movant is a corporation having a principal place of business located at ONE AMERICAN ROAD, Dearborn, MI 48126.
2. The Respondent, Ron Fish Electrical Services, Llc is an individual with a mailing address at 2743 E. Pacific Street, Philadelphia, PA 19134, who has filed a Petition on September 16, 2024 under Chapter 7 of the Bankruptcy Code.
3. On or about November 14, 2022, Debtor Ron Fish Electrical Services, Llc entered into a Retail Installment Contract, involving a loan in the amount of \$78,983.83 for the purchase of a 2022 Ford F-250 Super Duty Crew Cab Lariat 4WD 6.7L V8 T-Diesel.
4. The vehicle secured by the Contract has V.I.N. 1FT8W2BT6NEE74226.
5. Movant is the assignee of the Contract.

6. The above – described vehicle is encumbered by a lien with a payoff in the amount of \$65,359.35 plus other appropriate charges as of December 03, 2024 but subject to change. The regular monthly payment is \$1,426.66 at an interest rate of 8.94%.

7. Applying payments received to the earliest payment due, payments have been missed since July 29, 2024 in the amount of \$7,133.30, plus all applicable late charges, interest, attorneys' fees and costs.

8. On September 13, 2024, Movant repossessed the Collateral.

9. The Property has a N.A.D.A. Value of \$58,750.00.

10. The vehicle is not necessary to an effective reorganization.

11. The Movant is the only lienholder of record with regard to the vehicle.

12. Failure to make adequate protection payments is cause for relief from the automatic stay.

13. The Movant has incurred attorney's fees in the filing of this Motion.

14. The vehicle is a rapidly depreciating asset. Movant requests the waiver of Rule 4001(a)(3).

WHEREFORE, Movant prays for your Honorable Court to enter an Order permitting the Movant to proceed with the repossession proceedings of the aforementioned vehicle.

Respectfully submitted,  
Lavin, Cedrone, Graver, Boyd & DiSipio

/s/ Regina Cohen  
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